



BellSouth Telecommunications, Inc.  
Suite 2101  
333 Commerce Street  
Nashville, Tennessee 37201-3300

615 214-6301  
Fax 615 214-7406

REC'D TN  
REGULATORY AUTH.

May 26, 1999 PM 1 44

Guy M. Hicks  
General Counsel

OFFICE OF THE  
EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Third Party Testing of BellSouth's Operations Support Systems*  
Docket No. 99-00347

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the Response of BellSouth Telecommunications, Inc. to Petition for the Establishment of an Independent Third Party Testing Program of BellSouth's Operations Support Systems ("OSS"). Copies of the enclosed are being provided to counsel of record for AT&T.

Very truly yours,

Guy M. Hicks

GMH:ch  
Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**  
Nashville, Tennessee

In Re:           *Third Party Testing of BellSouth's Operations Support Systems*

Docket No. 99-00347

**RESPONSE OF BELL SOUTH TELECOMMUNICATIONS, INC. TO  
PETITION FOR THE ESTABLISHMENT OF AN INDEPENDENT  
THIRD PARTY TESTING PROGRAM OF BELL SOUTH'S  
OPERATIONS SUPPORT SYSTEMS ("OSS")**

BellSouth Telecommunications, Inc. ("BellSouth") responds to the Petition for the Establishment of an Independent Third Party Testing Program of BellSouth's Operations Support Systems ("OSS") filed by AT&T Communications of the South Central States, Inc. ("AT&T"). For the reasons set forth below, the Tennessee Regulatory Authority ("TRA") should deny AT&T's request.

**DISCUSSION**

Although BellSouth does not dispute the importance of its OSS to ensuring competition in the local market, AT&T's proposal that the TRA oversee a lengthy and time-consuming third party testing program of BellSouth's OSS is premised upon a number of misconceptions. First, AT&T's allegation that "many CLECs have no confidence in BellSouth's OSS" completely ignores that CLECs are making extensive use of these systems. AT&T Petition, ¶ 25. In fact, CLECs are now placing electronic orders over BellSouth's OSS interfaces at a pace of over 100,000 per month. Second, AT&T's claim that "CLECs have been unable to enter the local market on a meaningful and significant basis" because of alleged deficiencies in BellSouth's OSS ignores the experience in Tennessee. AT&T Petition, ¶ 7. Competitors in Tennessee have not hesitated to "commit resources" for entering the local business market in this state and have

had significant success in competing against BellSouth, as evidenced by the numerous access lines they currently serve. That many of these competitors may have elected not to serve residential customers is attributable to their business judgments, not BellSouth's OSS.

Furthermore, AT&T's claim that Tennessee has the "opportunity to be the first state to truly test BellSouth's claims of the adequacy of its OSS's [sic]" is untrue. On May 18, 1999, the Georgia Public Service Commission ("GPSC") ordered third party testing of BellSouth's OSS.<sup>1</sup> The third party testing, as ordered by the GPSC, focuses on three areas. First, BellSouth's OSS will be tested to assess functionality and operational readiness. Specifically, third party testing will be conducted on orders for: (1) UNE analog loops, with and without number portability; (2) UNE switch ports; and (3) UNE business and residence loop/port combinations. GPSC Order, at 3. The testing will encompass the OSS functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing. In addition, the TAG, EDI, ECTA, ODUF, EODUF, ADUF, CRIS and CABS interfaces will be tested. GPSC Order, at 4. Second, third party testing will be conducted to evaluate the overall capacity of BellSouth's OSS to handle expected commercial volumes of CLEC orders. *Id.* Finally, to ensure the accuracy of the report, the third party testing will include an independent audit of the CLEC order flow-through calculation submitted by BellSouth in the monthly SQM reports. *Id.* Additionally, the GPSC ordered BellSouth to file a detailed OSS test plan by May 28, 1999 and, after commencement of the testing, for the audit firms to provide interim reports. *Id.* Thus, third-party testing of BellSouth's OSS is taking place.

---

<sup>1</sup> See Order on Petition for Third Party Testing, Docket No. 8354-U dated May 20, 1999, attached hereto as Exhibit "A."

Once the standard rhetoric is dispelled, AT&T cites primarily three benefits that the TRA will gain by subjecting BellSouth's OSS to third party testing. First, third party testing will give the TRA an objective view of the overall functionality, capacity, and performance of BellSouth's OSS. Second, third party testing will allow the TRA to evaluate BellSouth's OSS in those areas where extensive commercial usage does not currently exist. Finally, the TRA can evaluate the overall capacity of BellSouth's OSS and the ability to handle large volumes of CLEC orders. AT&T Petition, at 6-7.

Clearly, the third party testing ordered by the GPSC encompasses fully each of these benefits discussed by AT&T. Because the third party testing ordered by the GPSC involves aspects of BellSouth's OSS that are regional in nature, the results of the testing in Georgia will have equal bearing in Tennessee. However, if AT&T had its way, BellSouth's regional OSS would have to undergo at least five third-party tests (since AT&T has filed its petition, as of today, in five BellSouth states). There is no compelling need for such a duplicative exercise, particularly when AT&T contends that BellSouth should incur the entire expense of the third party testing. Because third party testing will impose a considerable cost, BellSouth should not be required to duplicate, in each state, third party testing on regional systems. This is especially true given that the results of the third party testing in Georgia will be equally relevant to the TRA's evaluation of BellSouth's OSS in Tennessee.

AT&T contends that the TRA "could benefit from experience gained from the testing that has been conducted in New York." AT&T Petition, at 6. Given its position, AT&T could not possibly disagree that the TRA will derive great benefit from the third party testing ordered by GPSC. This is especially true in light of the fact that BellSouth's OSS are largely regional in nature, and the third party testing ordered by the GPSC is directed primarily at regional OSS

functions. Further, the credibility of the GPSC's focused supervised audit of BellSouth's OSS is enhanced by the fact that the GPSC Staff will work with the designated outside auditing firms in conducting the tests and in the preparation of the final recommendations.<sup>2</sup>

### CONCLUSION

BellSouth submits that the TRA should monitor the third party testing ordered by the GPSC and, at this juncture, decline to institute any independent third party testing in Tennessee. In order to keep the TRA informed fully about the GPSC's audit and testing, BellSouth commits to providing the TRA with the GPSC test plan and interim status reports. Thus, there is no need for the TRA to establish a separate docket regarding OSS testing.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



Guy M. Hicks

333 Commerce Street, Suite 2101  
Nashville, Tennessee 37201-3300  
(615) 214-6301

William J. Ellenberg  
Bennett L. Ross  
675 W. Peachtree Street, Suite 4300  
Atlanta, Georgia 30375

---

<sup>2</sup> BellSouth is befuddled by AT&T's claim that "[a] growing number of CLECs are filing highly complex OSS complaints against BellSouth at state commission." Petition, ¶ 23. No such complaints have been filed in Tennessee, and BellSouth is unaware of any "OSS complaint" in other states which AT&T has in mind. BellSouth is aware of the complaint it has filed against AT&T in Louisiana seeking to recover the costs of the electronic interface which BellSouth developed exclusively for AT&T. *BellSouth Telecommunications, Inc v. AT&T Communications of the South Central States, Inc.*, Louisiana Public Service Commission Docket No. 23967. Although BellSouth developed this interface to AT&T's specifications, AT&T decided not to use the interface which strongly indicates that AT&T's failure to "commit resources for entering the local market" has little to do with BellSouth's OSS.

**CERTIFICATE OF SERVICE**

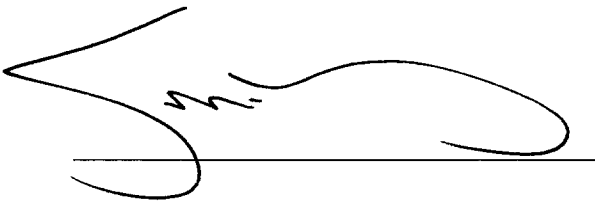
I hereby certify that on May 26, 1999, a copy of the foregoing document was served on the parties of record, via the method checked, addressed as follows:

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

Richard Collier, Esquire  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0500

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

James Lamoureux, Esquire  
AT&T  
1200 Peachtree St., NE  
Atlanta, GA 30309

A handwritten signature in black ink, appearing to read 'James Lamoureux', is written over a horizontal line.

## COMMISSIONERS:

STAN WISE, CHAIRMAN  
ROBERT S. BAKER, JR.  
DAVID L. BURGESS  
BOB DURDEN  
LAUREN "BUSSA" McDONALD, JR.

DEBORAH K. FLANNAGAN  
EXECUTIVE DIRECTOR

HELEN O'LEARY  
EXECUTIVE SECRETARY

# Georgia Public Service Commission

47 TRINITY AVENUE, S.W.  
ATLANTA, GEORGIA 30334-8701  
(404) 696-4501 OR 1 (800) 282-6613  
FAX: (404) 696-2341 www.psc.state.ga.us

1999 2 0 1999

Docket No. 8354-U

## ORDER ON PETITION FOR THIRD PARTY TESTING

**In re: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems**

The Georgia Public Service Commission ("Commission") issues this Order to establish a third party testing program of the operational support systems ("OSS") of BellSouth Telecommunications, Inc. ("BellSouth"). The Commission established this case to discuss and propose any necessary enhancements to BellSouth's operations support systems which will aid entry by competitive local exchange companies ("CLECs") into the local market, and to ensure that the systems meet the spirit and the intent of the Telecommunications Act of 1996. On June 4, 1998, the Commission issued its Order Adopting OSS Report. The Commission specifically left open this docket to continue to monitor the development of BellSouth's OSS.

On December 22, 1998, a coalition of Competitive Local Exchange Carriers (CLECs) filed a Petition for Establishment of a Third Party Testing Program of Operational Support Systems (the Petition). In the Petition, the CLECs outlined a proposal for third party testing. On January 21, 1999, BellSouth responded to the Petition and objected to any third party testing of its systems. BellSouth contended that the Commission's efforts in Docket No. 8354-U provided sufficient data to assess BellSouth's systems. After reviewing the CLECs' Petition and BellSouth's response, the Commission hereby grants the Petition in part and denied it in part.

### A. Discussion

The Commission agrees that testing of BellSouth's OSS by an outside party is a worthwhile endeavor. The Commission's authority to implement an audit stems from its general jurisdiction to examine the affairs of telecommunications companies, its authority to implement the Telecommunications and Competition Development Act of 1995 (the Georgia Act), and its authority to review BellSouth's compliance with Section 271 of the Telecommunications Act of 1996 (the Federal Act). The Commission notes that under Section 271 BellSouth has the burden of demonstrating compliance with the 14-point checklist.

Docket 8354-U  
Page 1 of 5

The Commission has been deeply involved in overseeing the development of BellSouth's OSS for three years, and feels that it has the expertise and knowledge to conduct a focused, supervised audit of BellSouth's OSS. The Commission has previously reviewed substantial documentation regarding the development and operation of BellSouth's OSS. The Commission has solicited comments from CLECs regarding issues associated with the implementation of BellSouth's OSS, has conducted a workshop which considered approximately 100 issues raised by the CLECs, and has issued specific directions to BellSouth regarding the enhancements necessary to bring its OSS into compliance with the requirements of the Federal and State acts. The Commission has monitored the progress toward the completion of these enhancements in this docket through the submission of monthly reports for the last year from BellSouth and the industry. In addition, through the adoption of performance measurements in Docket 7892-U and the monthly reports that have been filed by BellSouth over the last year, the Commission has reviewed a substantial amount of data regarding the performance of BellSouth's OSS, as well as the overall performance of BellSouth in the pre-ordering, ordering, provisioning, maintenance, repair, and billing of resold services and unbundled network elements. Finally, over the last three years, the Commission has held numerous hearing relating to the development and operation of BellSouth's OSS.

Because of the substantial involvement of the Commission in the development and operation of BellSouth's OSS noted above, the Commission does not believe that a full third party audit of all interfaces and services is necessary at this time. The Commission does believe, however, that a focused audit on those areas where BellSouth has not yet experienced significant commercial usage, and where CLECs have expressed concerns regarding operational readiness, is appropriate. In addition, because of the concerns raised by other parties regarding the flow-through performance data submitted by BellSouth, the Commission will order BellSouth to conduct a full audit of the Percent Flow-Through Service Requests performance measurement data submitted by BellSouth in its monthly performance data filing, utilizing a reputable third party, under the guidance and oversight of the Commission Staff.

Using the suggestion of the Joint Movants and the assessments of BellSouth's OSS already conducted by the Commission in this docket, the Commission sets forth herein a testing plan which has been designed to allow the Commission to conduct a thorough, yet efficient audit of those aspects of the BellSouth's OSS. Because the Commission and its Staff have been deeply involved with the development of BellSouth's system, the Commission believes that a focused audit will provide the additional information necessary for it to render an informed opinion with regard to BellSouth's compliance with its OSS obligations under Section 271 of the 1996 Telecommunications Act.

The audit will be conducted pursuant to the procedures set forth herein, and thus any other procedures delineated by the CLECs in the Motion are hereby denied.

**B. General Scope of Audit**

BellSouth shall engage two reputable audit firms of sufficient size and resources to perform testing of BellSouth's OSS. The two firms will be characterized herein as Firm A and Firm B. The two firms and the Commission Staff will comprise the audit team. The general responsibilities of each firm, and the Commission Staff, are as follows:



1. Firm A:

- The first audit firm ("Firm A") will conduct the actual tests of BellSouth's OSS;
- Firm A will conduct feature, function and volume tests using BellSouth's interfaces consistent with the requirements discussed below.
- Firm A will report the results of those tests assessing the functionality and operational readiness of BellSouth's OSS.

2. Firm B

- The second audit firm ("Firm B") will independently monitor the tests conducted by Firm A and provide assistance and reports to the Commission and its Staff in order to assist the audit of the tests;
- Firm B will evaluate the transactional and operational testing conducted through Firm A's test facility and BellSouth's OSS to determine whether the results reported through the test process match the raw data and the reports generated by BellSouth's OSS reporting systems. Firm B will also conduct the audit of BellSouth's Percent Flow-Through Service Request report described below;
- Firm B will prepare and deliver interim reports and a final report to the Commission on a schedule to be determined.

3. Commission Staff

The Commission designates the Commission Staff to work with Firm A and Firm B during the audit process. The Staff will work with the designated firms to conduct the testing to the extent deemed necessary by the Staff. The Staff also will work with the designated firms to prepare the final report to be presented to the Commission for the Commission's use in this docket, and in preparation for the Commission's recommendation in Docket No. 6863-U.

C. Specific Requirements of Testing1. Area of Testing

The Commission has reviewed the categories of orders placed electronically and believes that the audit should be focused on the following categories and orders: (1) UNE analog loops, both with and without number probability (INP, LNP); (2) UNE Switch Ports; and (3) UNE Business and Residence Loop/Port combinations. In addition, the Commission will require a

full audit (for the latest 3 months data) of the underlying BellSouth's Percent Flow-Through Service Request report submitted in its monthly filing in Docket 7892-U in order to ensure that the results reflected therein are correct. This audit will also include a review of BellSouth's error analyses.

2. OSS Functions to be Tested

The test will cover the five OSS functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing functions supported by an incumbent LEC's databases and information.

3. Interfaces to be Tested

The interfaces to be tested are Telecommunications Access Gateway ("TAG") pre-ordering, TAG ordering and EDI ordering, ECTA, TAFI, ODUF, EODUF, ADUF, CRIS and CABS billing.

4. Volume Testing

The systems will be tested at both normal and peak volumes to evaluate BellSouth's ability to process representative future wholesale transaction volumes to support CLEC's entry into the market. Volume data will be developed from actual transaction data, CLEC forecasts, and case studies of market share changes in related markets. Volume data will be developed by service and order type for: Resold Services, Unbundled Network Elements (including combinations of elements), Pre-Ordering transactions, and Trouble reports. All types of services and orders, with and without errors, will be included in the volume testing, as appropriate for the interface being tested.

5. Actual Test Plan

Within 10 days of the date of this Order, BellSouth shall file a detailed test plan that accomplishes the directives contained herein. The test plan shall also include an estimated time frame for accomplishing it. The Commission shall review and, if appropriate, modify this plan to ensure compliance with its order. BellSouth shall bear the costs associated with implementation of the test plan.

D. Conclusions

The audit firms will submit interim reports to the Commission and to BellSouth documenting the results of the audits.

At the conclusion of the audit, the firms, in conjunction with the Staff, will issue a final report to the Commission and to BellSouth documenting the results of the audit and any final conclusions.

When the final report is presented to the Commission, any interested CLEC will have the opportunity to comment on the results set forth in the final report.

The Commission will use the final report issued, in conjunction with information already collected in Docket No. 8354-U and Docket No. 7892-U, in arriving at its final recommendation to the FCC on the operational readiness of BellSouth's OSS.

**WHEREFORE IT IS ORDERED**, that the CLEC Petition for Establishment of a Third Party Testing Program of Operational Support Systems is hereby granted in part and denied in part as set forth in the body of this Order.

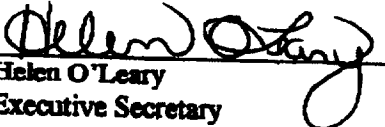
**ORDERED FURTHER**, that within 10 days of the date of this Order, BellSouth shall file a detailed test plan of its OSS for Commission review. BellSouth is further ordered to file, initiate, and complete the testing plan in compliance with the terms, conditions, and scope set forth in the body of this Order.

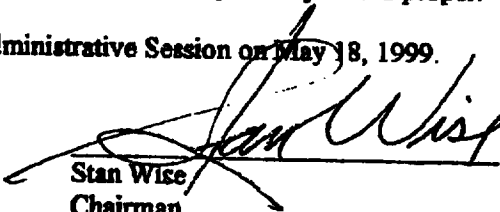
**ORDERED FURTHER**, that all findings, conclusions, and statements set forth in the preceding sections of this Order are adopted as findings of fact, conclusions of law, and statements of regulatory policy of this Commission.

**ORDERED FURTHER**, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

**ORDERED FURTHER**, that jurisdiction over these matters is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on May 18, 1999.

  
Helen O'Leary  
Executive Secretary

  
Stan Wise  
Chairman

May 20, 1999  
Date

5-20-99  
Date